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08/28/00

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

RE: Ultra-Wideband
ET Docket 98-153

Dear Ms. Salas,

I am writing in regards to the FCC's recent Notice of Proposed Rule Making on ultra-wideband radio. I am the Director of Software Engineering at DVP, Inc., a startup company located in Rockville, MD. DVP is creating platforms that allow developers of handheld test & measurement (T&M) devices to quickly – and at low-cost – bring state-of-the-art handheld instrumentation products to market. Typical customers for our OmniMeter line of products include low- and high-volume original equipment manufacturers of handheld test equipment in the telecom, semiconductor processing, biomedical, and automotive industries. Our customer base also includes consultants providing low-volume and "one-of-a-kind" handheld T&M solutions that leverage our products.

Developers of handheld T&M products have unique needs, such as high performance, rugged packaging, long battery life, and support for integrated signal acquisition and analysis. One area that is of great importance is wireless data communications. By definition, users of handheld T&M devices are doing remote diagnostics, unattended data logging, in-home and in-business maintenance, and other tasks that imply the need for mobility. Wireless data communications provide for unfettered communication of measurement data, on-line help, and data analysis to and from remote facilities. For many of our customers, wireless data communications are mandatory for a solution to be viable.

Though existing wireless products based on spread-spectrum radios and conforming to standards such as IEEE 802.11 have the benefit of providing Ethernet-like speeds and reasonable distances between radios, they can be expensive, and very power-hungry. In a handheld, battery-operated environment, power consumption is of extreme importance, as users expect 8+ hours of use on a single battery charge (with signal acquisition and analysis as well as wireless links up and running, not to mention display backlight and other functionality).

New wireless technologies such as Bluetooth show some promise in addressing the power consumption needs of our customers, but the required short distance between radios and limited bandwidth are concerns. On the other hand, the new ultra-wideband (UWB) technology is about

as close to a perfect fit for our customers as I could have imagined. Distances between radios can be long, data rates can be high, and – most importantly – power consumption is minimal.

The implementation of UWB technology would be a great boon for our customers, and would help DVP to further our goal of establishing an industry-wide platform for handheld T&M. I urge you to allow implementation of UWB technologies that allow for maximum performance, without jeopardizing public safety. It is my hope that with the swift implementation of UWB, the wireless communications capabilities of our products will provide a tremendous performance advantage to our customers.

Please feel free to contact me, should you have any questions.

Regards,

Andrew Girson
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